



July 5, 2005

Division of Dockets Management (HFA-305)  
5630 Fishers Lane, rm. 1061  
Rockville MD 20852

<http://www.fda.gov/dockets/ecomments>

RE: Docket No. 2004P-0294 – Proposed Rule: Food Labeling; Health Claims;  
Dietary Noncariogenic Carbohydrate Sweeteners and Dental Caries

The Calorie Control Council (the “Council”) is an international association of manufacturers of sugar-free, low/reduced calorie, low/reduced fat, and light foods and beverages. Companies that make and use sucralose are among the Council’s members.

The Council is pleased to support the Food and Drug Administration’s proposal to amend the regulation authorizing a health claim on noncariogenic carbohydrate sweeteners and dental caries to include sucralose. Sound scientific research supports the fact that sucralose is not fermented by oral bacteria and thus does not contribute to the production of organic acids by plaque bacteria, consequently sucralose does not promote tooth decay. It is, therefore, appropriate that sucralose containing products, as are polyol (sugar alcohol) and D-tagatose containing products, be allowed to bear the “does not promote tooth decay” health claim in accordance with U.S. Code of Federal Regulations, Title 21, Section 101.80.

Furthermore, FDA’s proposal further supports the American Dental Association (ADA) position statement, approved by the ADA’s House of Delegates in October 1998. The ADA statement acknowledges the “Role of Sugar-Free Foods and Medications in Maintaining Good Oral Health.” ADA strongly recommends that “that major efforts be made to promote the use of sugar-free foods or chewing substances in place of sugar containing foods that involve a frequent intake or repeated oral use . . . use of these sugar-free products will contribute to improved oral health.”

(<http://www.ada.org/prof/resources/positions/statements/sugarfre.asp>)

Respectfully submitted,

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LON/jcr